


EXHIBIT A

From: Andrew Phillips andy.phillips@mwpp.com 
Subject: Re: Paul v. Findeisen et al: M&C Call
Date: January 28, 2025 at 5:00 PM

AP

To: Rachel Garza Rgarza@dslawpc.com, Jeffrey A Neiman (Work) jneiman@mnrlawfirm.com, Shannon Timmann shannon.timmann@mwpp.com, Jason A Mays (Work) jmays@mnrlawfirm.com, Ricardo Cedillo rcedillo@lawdcm.com, Caroline Small csmall@dslawpc.com, Jason Davis jdavis@dslawpc.com
Cc: Dela Valdez dvaldez@dslawpc.com, Jasmine Capetillo jcapetillo@dslawpc.com

Jason, Caroline, and Rachel,

Thanks for the call today. I wanted to follow-up to summarize our conversation and the action items we have agreed to. Please let me know if you understood any of the below differently.

As to the issues raised in my letter of January 21 with respect to Defendants' privilege log, Defendants have offered to provide a declaration that provides a greater level of detail as to the nature and subject matter of the documents being withheld under a qualified privilege. Without conceding that is sufficient, Plaintiff has agreed to explore whether that can resolve the issue. Defendants will provide by Monday a working draft of that declaration with examples so that we can understand what information you are proposing to provide and see if it makes sense to continue to explore this potential resolution of the dispute.

Defendants have agreed to withdraw their common interest/allied litigant objections as to communications that took place before Mr. Findeisen was a party to this litigation, and they will do so this week.

Defendants are going to review again the issue of Mr. Findeisen's communications with third parties regarding his Logan Paul videos that seem to be absent from their production, including specifically responses and comments regarding the two videos that are the subjects of the counts of Plaintiff's Complaint.

Defendants will let us know by this Thursday if they are standing on a relevance objection as far as producing documents and communications relating to Defendants' fundraising for this lawsuit.

Defendants are going to check again about accessing viewership metrics for all of the Coffeezilla videos concerning Logan Paul and will let us know on that by February 14.

You have told us again that Defendants do not have insurance coverage for defense costs or a judgment in this case. We ask that you confirm in writing that remains the case.

Plaintiff confirmed that we will stand on our confidentiality designations that Defendants have raised issues with, absent some showing from Defendants that we are misinterpreting the plain language of the protective order.

Plaintiff continues to look into the issue of attachments to the .json files and will have a response to you on that by tomorrow. Same as to the Signal communications referenced therein.

Plaintiff anticipates making a sizeable supplemental production this week, which will largely complete our responsive production (though of course we will continue to supplement as required and as necessary).

Plaintiff will then immediately begin work on a log of documents withheld as attorney-client privilege or work product. Plaintiff hopes to complete that log by February 14, though if that

is not feasible, will at least disclose the log on a rolling basis beginning no later than February 14.

We've agreed to exchange on Monday counsels' available/unavailable dates for depositions in February, March, and April so that the parties can begin getting out subpoenas and scheduling depositions.

Andrew C. Phillips
Managing Partner
MEIER WATKINS PHILLIPS PUSCH LLP

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From: Rachel Garza <Rgarza@dslawpc.com>
Date: Monday, January 27, 2025 at 6:04 PM
To: Andrew Phillips <andy.phillips@mwpp.com>, Jeffrey A Neiman (Work) <jneiman@mnrlawfirm.com>, Shannon Timmann <shannon.timmann@mwpp.com>, Jason A Mays (Work) <jmays@mnrlawfirm.com>, Ricardo Cedillo <rcedillo@lawdcm.com>, Caroline Small <csmall@dslawpc.com>, Jason Davis <jdavis@dslawpc.com>
Cc: Dale Molder <dmolder@dslawpc.com>, Ismael Carrillo

Cc: Dela Valdez <dvaldez@dslawpc.com>, Jasmine Capetillo <jcapetillo@dslawpc.com>
Subject: RE: Paul v. Findeisen et al: M&C Call

Thank you. We'll talk to you all then.

Regards,
Rachel

From: Andrew Phillips <andy.phillips@mwpp.com>
Sent: Monday, January 27, 2025 5:01 PM
To: Rachel Garza <Rgarza@dslawpc.com>; Jeffrey A Neiman (Work) <jneiman@mnrlawfirm.com>; Shannon Timmann <shannon.timmann@mwpp.com>; Jason A Mays (Work) <jmays@mnrlawfirm.com>; Ricardo Cedillo <rcedillo@lawdcm.com>; Caroline Small <csmall@dslawpc.com>; Jason Davis <jdavis@dslawpc.com>
Cc: Dela Valdez <dvaldez@dslawpc.com>; Jasmine Capetillo <jcapetillo@dslawpc.com>
Subject: Re: Paul v. Findeisen et al: M&C Call

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Hi Rachel,

That is fine. I will send an updated calendar invite.

Andrew C. Phillips
Managing Partner
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From: Rachel Garza <Rgarza@dslawpc.com>
Date: Monday, January 27, 2025 at 5:49 PM
To: Andrew Phillips <andy.phillips@mwpp.com>, Jeffrey A Neiman (Work) <jneiman@mnrlawfirm.com>, Shannon Timmann <shannon.timmann@mwpp.com>, Jason A Mays (Work) <jmays@mnrlawfirm.com>, Ricardo Cedillo <rcedillo@lawdcm.com>, Caroline Small <csmall@dslawpc.com>, Jason Davis <jdavis@dslawpc.com>
Cc: Dela Valdez <dvaldez@dslawpc.com>, Jasmine Capetillo <jcapetillo@dslawpc.com>
Subject: RE: Paul v. Findeisen et al: M&C Call

Good afternoon, all –

Would it be possible to reschedule this call for 9 a.m. CST tomorrow? Apologies in advance for any inconvenience.

Best regards,
Rachel

**DAVIS
SANTOS**

Rachel Garza
Attorney

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-----Original Appointment-----

From: Andrew Phillips <andy.phillips@mwpp.com>
Sent: Thursday, January 23, 2025 4:55 PM
To: Andrew Phillips; Rachel Garza; Jeffrey A Neiman (Work); Shannon Timmann; Jason A Mays (Work); Ricardo Cedillo; Caroline Small; Jason Davis
Subject: Paul v. Findeisen et al: M&C Call
When: Monday, January 27, 2025 6:30 PM-7:30 PM (UTC-05:00) Eastern Time (US & Canada).
Where:

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-----Original Appointment-----

From: Andrew Phillips <andy.phillips@mwpp.com>

Sent: Wednesday, January 22, 2025 12:28 PM

To: Andrew Phillips; Jeffrey A Neiman (Work); Shannon Timmann; Jason A Mays (Work); Ricardo Cedillo; Caroline Small; Jason Davis

Subject: Paul v. Findeisen et al: M&C Call

When: Monday, January 27, 2025 6:30 PM-7:30 PM (UTC-05:00) Eastern Time (US & Canada).

Where:

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